

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

TONY AND MII'S, INC.	§	
TONY THANGSONGCHAROEN, and	§	
SOMNUEK THANGSONGCHAROEN	§	Case No. 3:17-cv-609-B
	§	
Plaintiffs,	§	
	§	
vs.	§	
	§	
UNITED STATES OF AMERICA,	§	
	§	
Defendant.	§	

**NOTICE OF SETTLEMENT AND JOINT MOTION
FOR TEMPORARY STAY OF PROCEEDINGS**

The parties hereby notice the Court that they have reached a settlement in this matter, and jointly request a temporary stay of proceedings for ninety (90) days during which time they will fulfill their respective obligations under the settlement agreement.

At the conclusion of this ninety day period, the parties anticipate filing a stipulation of dismissal pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). In the event that the parties need additional time, they request that they be able to file a status report to inform the Court.

Accordingly, the parties request that the Court stay all deadlines in this matter, and vacate hearing on the United States' Amended Motion for Protective Order [D.E. 43], currently set for February 26, 2019; and the Pretrial Conference and Trial Setting, currently set for May 31, 2019 and June 3, 2019, respectively.

DATED this 20th day of February, 2019.

/s/ Curtis C. Smith
CURTIS C. SMITH
State Bar No. AZ 026374
MOHA P. YEPURI
Texas State Bar No. 24046651
Trial Attorneys, Tax Division
U.S. Department of Justice
717 N. Harwood, Suite 400
Dallas, Texas 75201
(214) 880-9734/67
(214) 880-9741 (fax)
Curtis.C.Smith@usdoj.gov
Moha.P.Yepuri@usdoj.gov

ATTORNEYS FOR UNITED STATES

/s/ Jason B. Freeman
JASON B. FREEMAN
Freeman Law, PLLC
2595 Dallas Parkway, Suite 20
Frisco, Texas 75034
Jason@freemanlaw-llc.com

COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I certify, that on February 20, 2019, I filed the foregoing using the Clerk's ECF system which will serve an electronic copy on the following:

Jason B. Freeman
Freeman Law, PLLC
2595 Dallas Parkway, Suite 420
Frisco, Texas 75034
Jason@freemanlaw-llc.com
Counsel for all Plaintiffs

/s/ Curtis C. Smith
CURTIS C. SMITH